

EXHIBIT A

From: [Harkins, Steven M. \(Assoc-ATL-LT\)](#)
To: "John Davis"; valpec@kirtlandpackard.com
Cc: DECValsartan@btlaw.com
Subject: RE: Valsartan MDL - M&C on Defs' Requests for Additional Deposition Time
Date: Thursday, December 30, 2021 12:16:00 PM
Attachments: [image003.png](#)
[image001.png](#)

John,

We think the Court's instructions were clear and will be briefing the request on both experts in advance of the depositions, as recommended by Judge Vanaskie. We would prefer to discuss a proposed briefing schedule rather than submitting something at next week's CMC without meeting and conferring. Our side is available Friday and early next week as well.

Best,

Steven M. Harkins
Associate

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From: John Davis <jdavis@slackdavis.com>
Sent: Thursday, December 30, 2021 10:00 AM
To: Harkins, Steven M. (Assoc-ATL-LT) <harkinss@gtlaw.com>; valpec@kirtlandpackard.com
Cc: DECValsartan@btlaw.com
Subject: Re: Valsartan MDL - M&C on Defs' Requests for Additional Deposition Time

EXTERNAL TO GT

Steven, given that your email was sent last night and there being only one business day left this week (today), I don't think we're going to be able to get the necessary people on our side on the phone. I will note, however, that Judge Vanaskie has already stated his view that he will not be able to tell if additional time is needed in advance of the deposition. Accordingly, our position is that both sides should work within the 7 hour framework and make assessments afterward, per the Court's instructions.

John

From: harkinss@gtlaw.com <harkinss@gtlaw.com>
Date: Wednesday, December 29, 2021 at 7:41 PM
To: valpec@kirtlandpackard.com <valpec@kirtlandpackard.com>
Cc: DECValsartan@btlaw.com <DECValsartan@btlaw.com>

Subject: Valsartan MDL - M&C on Defs' Requests for Additional Deposition Time

Counsel,

Pursuant to the Court's instructions during the last CMC, Defendants will request additional time for the depositions of Plaintiffs' experts Quick and Conti. Defendants will request 10 hours for each deposition. Please let us know some times this week that your side can be available to meet and confer on these requests. We would also like to discuss a proposed expedited briefing schedule in the event you oppose the requests for additional time.

Best,

Steven M. Harkins
Associate

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